

REMARKS

This is intended as a full and complete response to the Office Action dated May 31, 2005, having a shortened statutory period for response set to expire on August 31, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Information Disclosure Statement

Applicants request acknowledgement and consideration of the information disclosure statement dated October 29, 2003.

Claim Objections

Claims 45 and 95 stand objected to because of informalities. In response, Applicants have canceled claim 45 and corrected the informality in claim 95. Accordingly, Applicants respectfully request withdrawal of the objections and allowance of the claim.

Claim Rejections - 35 U.S.C. § 102

Claims 66 and 93-95 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Richard et al.* 6,263,972. In response, Applicants respectfully traverse the rejections.

Richard et al. discloses coiled tubing that can have a longitudinally corrugated shape as shown in Figure 3. Thus, *Richard et al.* fails to teach a reelable downhole tubular having a corrugated wall defining selected periodic corrugations with a substantially circumferential component, as recited in claim 66. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claim 66.

Richard et al. discloses downhole screens delivered into a wellbore on coiled tubing after the wellbore has been drilled, but does not contemplate using the tubing or screens to drill the wellbore. Therefore, *Richard et al.* fails to disclose a corrugated tubular as a drill bit support and drilling with the drill bit, as recited in claim 93.

Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claim 93 and claims 94 and 95 dependent thereon.

Claims 1, 2, 3, 6, 8, 9, 11, 12, 16, 17, 21, 27, 31-33, 54, 56, 58, 65, 66, 73-80, 87-89 and 91 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Haugen et al.* In response, Applicants respectfully traverse the rejection. Further, claims 9, 11, 12, 54, 65, 73-80, 88, 89 and 91 are cancelled without prejudice.

The foreign priority filing date of the present application filed on July 7, 2003 is July 6, 2002. As acknowledged in the Office Action, the certified copies of the foreign priority documents have been received by the Patent Office. This date of July 6, 2002 antedates the provisional application date of May 2, 2003 that *Haugen et al.* claims priority to. Should the amendments to the claims presented herein fail to patentably distinguish over *Haugen et al.*, Applicants further submit that the claim to foreign priority overcomes any rejection over *Haugen et al.* In addition, Applicants assume that the rejection does not rely on the continuation-in-part priority claim of *Haugen et al.* However, Applicants request basing the rejection on that patent (U.S. Patent No. 6,708,767) if such reliance is made.

Claims 1-3, 7, 8, 17, 18, 20-25, 27-38, 44-52 and 65 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Nazzai et al.* 6,253,850. In response, Applicants respectfully traverse the rejection. Further, claims 7, 36, 44-52 and 65 are cancelled without prejudice.

Nazzai et al. discloses expanding liners that can be folded (*i.e.*, longitudinally) to the full diameter of a surrounding wellbore, which causes the liners to have random undulations corresponding to unevenness of the wellbore's wall. These random undulations of the liner are not selected periodic corrugations. Therefore, *Nazzai et al.* fails to teach corrugating the tubular in the bore into selected periodic corrugations, as recited in claims 1, 32 and 34. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claims 1, 32 and 34 and claims 2, 3, 8, 17, 18, 20-25, 27-31, 33 and 35 dependent on these claims.

Regarding claim 37, *Nazzai* discloses that epoxies, rubber, or other sealing materials can be utilized to better effect a seal between an expanded slotted liner and a tubular liner. Use of the epoxy cannot be considered to anneal the tubular liner. In contrast to these materials on the outside of the liner, annealing is a process of heating/cooling a tubular member to alter its material properties. Further, there is no indication in *Nazzai* that “expansion of the tubing actuates the epoxy,” as suggested by the Examiner. Therefore, *Nazzai* does not contemplate annealing a tubular following corrugation, as recited in claim 37. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claim 37.

Regarding claim 38, *Nazzai* fails to teach tubular members that have walls defining helical corrugations. Rather, the tubular members that can be folded (*i.e.*, longitudinally) in *Nazzai* are expanded against a wall of a wellbore that is not uniform as described in column 2, lines 47-57, such that expansion is at various rates in different directions and for different distances. Thus, Applicants request withdrawal of the rejection and allowance of claim 38.

Claims 1-8, 13-17, 20, 22-25, 27-36 and 65 stand rejected under 35 U.S.C. § 102(b) as being anticipated by WO 0146551. Claims 7, 36 and 65 have been cancelled without prejudice.

WO 0146551 discloses forming a series of helical grooves in a tubular member with extendable rollers of an expansion tool while expanding the area between the helical grooves with a fixed diameter cone of the expansion tool. Thus, WO 0146551 fails to disclose corrugating a tubular in a bore into selected periodic corrugations, each having a substantial circumferential component, wherein the tubular is diametrically expanded at the corrugations and between the corrugations by a radially extendable member configured to also provide the corrugations, as recited in claims 1, 32 and 34. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claims 1, 32 and 34 and claims 2-6, 8, 13-17, 20, 24, 25, 27-30, 33 and 35 dependent on these claims.

Claims 1-7, 9, 11-20, 24, 25, 27, 31-33, 36 and 65 stand rejected under 35 U.S.C. § 102(b) as being anticipated by GB 2350137. Claims 7, 9, 11, 12, 36 and 65 are cancelled without prejudice.

GB 2350137 teaches a liner that is longitudinally corrugated. Therefore, GB 2350137 fails to disclose corrugating the tubular in the bore into selected periodic corrugations, each having a substantial circumferential component, as recited in claims 1 and 32. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claims 1 and 32 and claims 2-7, 9, 11-20, 24, 25, 27, 31 and 33 dependent on these claims.

Claim Rejections - 35 U.S.C. § 103

Claims 4, 5, 13-15, 20 and 92 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Haugen et al.* Applicants have canceled claim 92 without prejudice.

Applicants submit that these claims are patentable over *Haugen et al.* based at least on the traversal presented above regarding claim 1 from which these claims depend. Accordingly, Applicants request allowance of the claims.

Claims 4-6, 13-16, 19, 28-30, 53, 66 and 92 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Nazzai et al.* Applicants have canceled claims 53 and 92 without prejudice.

Applicants submit that claims 4-6, 13-16, 19 and 28-30 are patentable over *Nazzai et al.* based at least on the traversal presented above regarding claim 1 from which these claims depend. Accordingly, Applicants request allowance of the claims.

Regarding claim 66, there is no indication that liners taught in *Nazzai et al.* have selected periodic corrugations with a substantially circumferential component. In contrast, the liners can be folded (*i.e.*, longitudinally) and once expanded have random undulations corresponding to unevenness of a wellbore's wall. Therefore, *Nazzai et al.* fails to teach a reelable downhole tubular that has a corrugated wall defining selected periodic corrugations with a substantially circumferential component, as recited in claim 66. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of the claim.

Allowable Subject Matter

Claims 10, 26, 39-43, 59, 60 and 90 stand objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. Claim 10 has been amended to be in independent form. Applicants submit that claims 26 and 39-43 are patentable based at least on the traversal presented above regarding the independent claims from which these claims depend. Claims 59, 60 and 90 have been rewritten in independent form in claims 96-98, respectively.

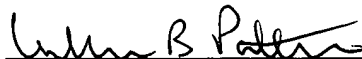
Claims 55, 61-64, 67-72 and 81-86 are allowed. Applicants acknowledge allowance of these claims.

Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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